Addendum 2: Efficient Use of FM IBOC DAB (HD Radio) for AM Programming

In this **FCC Proceeding 17-105**, I am proposing that all U.S. AM broadcast stations be moved to FM, on an FM expanded band, through the repurposing and use of the television Channel 6 bandwidth, along with using 'HD sub-channels' on co-owned FM stations in the existing non-reserved band, Channels 221 – 300.

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In my previous **Reply Comment** in this proceeding, '**Addendum 1: FM on Channel 6 proposal alternatives**', I suggested that the television Channel 5 bandwidth also be used to relocate AM stations, in order to accommodate the move of the large number of AM stations that exist in the larger U.S. radio markets and urban areas. However, I also acknowledged that the FCC is already engaged in the planned 'repacking' of hundreds of television stations to new channel assignments, including reassigning a small number of television stations to 'Low VHF' channels, which includes the Channels 5 and 6 bandwidth. As a result, I have put forward, if required, a 'compromise' proposal that uses only the Channel 6 bandwidth for an FM expanded band, given its contiguous location next to the existing FM band, which starts at Channel 201, at 88.1 MHz.

Under my 'Channel 6-only' proposal, given the large quantity of AM stations to be moved in large and urban radio markets, I recommended that, for the purpose of maximum efficiency, AM stations would first be required to move to co-owned, in-market FM stations, on 'HD sub-channels'. As I also stated, there are already many situations around the country where radio broadcasters are simulcasting one or more of their AM stations on co-owned, in-market FM stations.

Though it is officially experimental, at this point, 'AM-on-FM' simulcasting, on co-owned FM stations, is also successfully occurring in Canada. From the article, 'Corus Ventures Boldly Into HD Radio', from the July 5, 2017, print edition of ***Radio World*** magazine:

- "We frankly have achieved better results [than] we had projected for. HD Radio is a solid solution for getting our AM content in downtown Toronto, interference-free via FM."
- "…we are impressed with how well HD Radio via FM is solving our AM propagation problems in downtown areas."

The above quotes, in the *Radio World* piece, are from **John Coldwell**, director of radio technology at **Corus**, a major Canadian radio and television broadcaster. I am submitting this *Radio World* article, accompanying this Addendum, as a timely, 'real world' example that moving AM stations and programming to a co-owned IBOC DAB FM station is a viable, technological solution to the increasing 'noise' and interference problems that afflict AM stations. [Note: Neither the editorial management at *Radio World* magazine; James Careless, the author of the above article; nor John Coldwell of Corus, are endorsing my 'AM-to-FM' proposal in this FCC proceeding, or in any forum.

Per the ‘fair use’ doctrine, I am including the article, in this Proceeding, for informational and ‘discussion’ purposes only.]

So, again, while it is my hope that the additional Channel 5 bandwidth would also be included in this proposed establishment of an FM expanded band, moving co-owned AM stations onto existing FM band stations would be an efficient ‘compromise’ for accommodating the relocation of the many AM stations in spectrally crowded large radio markets and urban areas.

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Attachment (1): ‘Corus Ventures Boldly Into HD Radio’, James Careless, ***Radio World*** magazine (online edition), July 12, 2017.